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Internal Letter



Rockwell International

Date · February 2, 1989

No. · LAM.FDH2

TO (Name, Organization, Internal Address)

- A. C. Ficklin
- Waste Programs
- Bldg. 374

FROM (Name, Organization, Internal Address, Phone)

- F. D. Hobbs
- Environmental Management
- Bldg. 250
- Ext. 7006

SUBJECT · LAUNDRY WASTE WATER

Environment and Health Programs personnel are unified in the decision that discharge of laundry waste water to the sanitary treatment system is not acceptable. This position is based upon plant policy documented in the Environmental Impact Statement which does not allow process waste water (specifically including laundry waste water) discharges to the sanitary system. This position is additionally based upon prudent waste management and RCRA considerations. Even if plant policy allowed this operation, it is not technically possible to adequately screen waste waters prior to discharge to the sanitary system because of lag time between sample collection and analysis and the very low analytical sensitivity that would be required. Therefore, the risk of further radioactive contamination increases which is inconsistent with DOE's ALARA goal.

Our recent discussions with K. McKinley (RCRA programs) on this topic indicate that he also is not supportive of the proposed discharges, since the B series of ponds are not solid waste management units (SWMUs) and the laundry water a regulated waste stream. Discharges of any potential contaminants to those ponds from the sanitary system may also present significant legal problems for Rocky Flats RCRA compliance issues. DOE Order 6430.1 (p XXI-24) specifically prohibits the interconnection between a plant's sanitary waste system and a plutonium handling area. We feel that this laundry effluent must be disposed according to established policies and existing facilities (i.e. 374/774 treatment versus any discharge to the sewage treatment plant). I can meet with you to defend/document our position at your convenience. If you wish to pursue this issue further, I suggest that a meeting with higher management be arranged because of the risks and vulnerabilities outlined.

F. D. Hobbs, Manager
Environmental Management

cc: R. W. Hawes ✓
F. P. Lawton
R. C. Lerche
K. B. McKinley
G. H. Setlock
C. L. Sundblad

ADMIN RECCRD

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